

1 MICHAEL N. FEUER, City Attorney, SBN 111529  
2 MARY CLARE MOLITOR, Chief, Criminal and Special Litigation Branch, SBN 82404  
3 JONATHAN CRISTALL, Assistant City Attorney, SBN 191935  
4 KIMBERLY A. ERICKSON, Deputy City Attorney, SBN 213634  
200 North Main Street, City Hall East, Room 966  
Los Angeles, California 90012  
Telephone: (213) 978-4090  
5 Fax: (213) 978-8717  
6 E-Mail: kimberly.erickson@lacity.org

NO FEE – GOV'T CODE §6103

CONFORMED COPY  
ORIGINAL FILED  
Superior Court Of California  
County Of Los Angeles

NOV 20 2015

7 Attorneys for Plaintiff

Sherri R. Carter, Executive Officer/Clerk  
By: Kristina Vargas, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

11 THE PEOPLE OF THE STATE OF CALIFORNIA,

12 Plaintiff,

13 vs.

14 ANALIA E. BORTOLO, an individual; LAWRENCE  
15 C. GREEN, an individual; ROSLIN CHILDERS-  
16 GREEN, an individual and Does 1 through 50,  
inclusive,

17 Defendants.

CASE NO: **BC 6 0 1 6 7 1**

**COMPLAINT FOR ABATEMENT  
AND INJUNCTION**

[CIVIL CODE SECTION 3479, *ET*  
SEQ.; BUS. & PROF. CODE  
SECTION 17200, *ET* SEQ.]

(Unlimited Action)

21 PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

23 **I. INTRODUCTION**

24 1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the  
25 State of California (the "People"), for the purpose of abating, preventing and enjoining a  
26 dangerous gang-related public nuisance which consists of a single family dwelling and  
27 attached triplex, located in South Los Angeles with an address commonly known as 857 East  
28 90th Street, Los Angeles, CA. 90002 (the "Property"). (Exhibit 1). For approximately the past

30 years, the Property has served as a stronghold and epicenter for the Family Swan Bloods (the "Swans") criminal street gang. The Swans are an African American gang founded in the late 1970's in South Los Angeles. The Swans' presence is so deeply rooted in the community, and at this Property in particular, that their "clique," or gang subset, is "89" because their "turf" or territory is concentrated around 89th Street, only one block north of the Property. The Action is brought pursuant to the Public Nuisance Law ("PNL"), California Civil Code sections 3479-3480, and the Unfair Competition Law ("UCL"), California Business and Professions Code section 17200, *et seq.*

2. This Action is filed simultaneously with another abatement lawsuit against the owner of a 36-unit apartment complex located in South Los Angeles, with an address commonly known as 9310 South Central Avenue, Los Angeles, which is located less than a 1/2 mile from the Property. The South Central Ave. location is a stronghold and hangout for the Be Bop Bloods, a rival Blood gang of the Swans. Both gangs exist in close proximity to each other and share a common "turf" boundary of 92nd Street. The Property and the South Central Ave. location are hotbeds of violence, as a deadly feud between the two gangs has been ongoing for the past ten years, and in fact, has escalated and intensified over this past year. This current burgeoning battle is suspected to be the source of numerous shootings at the Property, including the most recent shooting on September 24, 2015, of three young women in front of the Property.

3. The Property, located in a residential area, is a major gang hangout where Swans gang members also live. The Swans are a notorious gang, with a substantial and menacing presence in and around the neighborhood where the Property is located. Gang members who do not live at the Property loiter and congregate on and around the Property, including a carport that is tucked under the triplex and has been converted into a "gang den," with a couch, TV, refrigerator, table and blue tarps hung over the open areas. (Exhibit 2). This carport serves as a place to "hangout" and as cover for the gang's illegal activities, out of sight from patrolling police officers as well as rival gang members. Swans graffiti is prominently displayed within the carport, as well as on and around the Property. (Exhibit 3).

1           4. Swans gang members regularly congregate at the Property and terrorize not only  
2 the residents, but the citizens of the neighborhood as well. This overt gang presence  
3 intimidates those who live at the Property and in the surrounding area. Swans gang members  
4 sell narcotics and arm themselves with loaded firearms that are stored throughout the  
5 Property, easily accessible to them in the event they need to protect their turf from rival gang  
6 fire. One gang member admitted to police officers that the loaded gun the officers found on  
7 the couch in one of the units was given to him for protection "due to all of the violence in the  
8 area." Residents have reported multiple shootings and police have recovered bullet  
9 fragments from vehicles parked at the Property. (Exhibit 4).

10           5. For years, the Los Angeles Police Department ("LAPD") has devoted  
11 considerable resources to responding to calls in order to suppress the den of criminal activity  
12 at the Property, and continue to do so today. Since just 2011, there have been five  
13 documented drive-by shootings<sup>1</sup>, one stabbing, nine loaded guns recovered, with mostly all of  
14 them recovered from gang members at the Property. During this time, officers have made  
15 approximately six arrests at the Property for gun possession. This longstanding pernicious  
16 gang presence corrodes public safety in the surrounding neighborhood and causes a  
17 significantly disproportionate drain on law enforcement resources.

18           6. To demonstrate just how rapidly the violence at the Property has escalated and  
19 intensified, within the past two months there have been three documented incidents of  
20 criminal and nuisance activity involving gun violence and directly connected to the Property:

21           • **September 22, 2015**- three young women were sitting in a car directly in front  
22 of the Property when a vehicle with four males drove up and began firing a semi-  
23 automatic hand gun into the vehicle.

24           • **September 24, 2015**-police officers were serving a search warrant at the  
25 Property and observed a male, later identified as a convicted felon and Swans  
26 gang member, toss a rifle from the window of a back unit. Officers entered the  
27 unit and recovered multiple firearms with ammunition.

28 <sup>1</sup> This number is likely significantly higher, as many times shootings do not get reported to  
LAPD

1           7.     The violence and chaos at the Property occurs perilously close to two churches,  
2 a high school, and a recreation center, all of which are all located within approximately 2,000  
3 feet of the Property. The constant presence of gang members in front of, and at the Property,  
4 only serves as a target for rival gang members looking to settle a score at the expense of  
5 innocent victims who could get caught in the gangs' crosshairs.

6           8.     Defendants' failure to implement appropriate security and other managerial best  
7 practices make it so that LAPD cannot solve the problem by simply making arrest after arrest.  
8 The Defendant, ANALIA E. BORTOLO (Defendant "BORTOLO"), as the current owner and  
9 manager, must play a far more robust, engaged and committed role than she has to date. The  
10 prior owners, Defendants LAWRENCE C. GREEN (Defendant "GREEN") and ROSLIN  
11 CHILDERS-GREEN (Defendant "CHILDERS-GREEN") owned the Property for over 20 years,  
12 while this location was spiraling out of control and did nothing to effectively address the  
13 pervasive gang presence and criminal activity occurring there. The intent of this nuisance  
14 abatement prosecution is to stimulate such action by Defendant BORTOLO and to bring the  
15 dangerous and violent situation at the Property to a swift and permanent end.

## 16                               II.     THE PARTIES AND THE PROPERTY

### 17           A.     Plaintiff

18           9.     Plaintiff, the People, is the sovereign power of the State of California designated  
19 in California Health and Safety Code section 11571 and California Code of Civil Procedure  
20 section 731 to be the complaining party in actions brought to abate, enjoin, and penalize  
21 narcotics nuisances and public nuisances, respectively. Furthermore, the City of Los Angeles  
22 has a population in excess of 750,000, and as such, California Business and Professions Code  
23 section 17204 authorizes Plaintiff, the People, to prosecute actions for relief under California  
24 Business and Professions Code section 17200, *et seq.* for unlawful competition.

### 25           B.     The Defendants

26           10.    Defendants GREEN and CHILDERS-GREEN, both individuals, owned and/or  
27 managed, controlled, operated and/or acted as the lessor of the Property during all or  
28 substantial parts of the time period from 1994 to August 2015. Defendants GREEN and

1 CHILDERS-GREEN, whether by commission or omission, have directly or indirectly permitted  
2 Swans gang members and/or their associates to rent and/or live at the Property and/or to be  
3 present at the Property and use the Property for illegal and unlawful purposes, including the  
4 possession of unlawful firearms and other gang-related activity, thereby violating the PNL.

5 11. Defendant BORTOLO, is an individual who purchased the Property from  
6 Defendants GREEN and CHILDERS-GREEN on or around August 28, 2015, and is the current  
7 record owner of the Property.

8 12. The true names and capacities of defendants sued herein as Does 1 through 50,  
9 inclusive, are unknown to Plaintiff, who therefore sues said defendants by such fictitious  
10 names. When the true names and capacities of said defendants have been ascertained,  
11 Plaintiff will seek leave of Court to amend this complaint and to insert in lieu of such fictitious  
12 names the true names and capacities of said fictitiously named defendants.

13 **C. The Property**

14 13. The property is a single family dwelling and attached triplex, located in South Los  
15 Angeles with an address commonly known as 857 East 90th Street, Units A, B, C, D, Los  
16 Angeles, CA. 90002. The Property's legal description is "Lot 168, of tract No. 6631, in the City  
17 of Los Angeles, County of Los Angeles, State of California, as per map recorded in book 71,  
18 pages 50 and 51 of maps, in the Office of the County recorder of said County," Assessor's  
19 Parcel Number 6042-017-002.

20 **III. THE PUBLIC NUISANCE LAW**

21 14. The Public Nuisance Law ("PNL"), Civil Code section 3479, defines a public  
22 nuisance as "[a]nything which is injurious to health, including, but not limited to, the illegal sale  
23 of controlled substances, or is indecent or offensive to the senses, or an obstruction to the free  
24 use of property, so as to interfere with the comfortable enjoyment of life or property...". (See  
25 *City of Bakersfield v. Miller* (1966) 64 Cal.2d 93, 99 ("The Legislature has defined in general  
26 terms the word 'nuisance' in Civil Code section 3479...")).

27 15. Civil Code section 3480 defines a public nuisance as "one which affects at the  
28 same time an entire community or neighborhood, or any considerable number of persons,

1 although the extent of the annoyance or damage inflicted upon individuals may be unequal."

2 16. In particular, gang activity, such as drug dealing, loitering, consumption of alcohol  
3 and illegal drugs, and boisterous conduct which creates a "hooligan-like atmosphere"  
4 constitutes a public nuisance. (*People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.)  
5 Furthermore, case law is "replete with examples" of the "threat violent street gangs ... pose to  
6 the safety of peaceful Californians." (*Castaneda v. Olsher* (2007) 41 Cal.4th 1205, 1216.) In  
7 a case involving gang-related gunfire similar to what is occurring at the Property here, the  
8 California Supreme Court explicitly recognized that "[s]treet gang activity can often subject"  
9 innocent bystanders "to unacceptable levels of risk." (*Id.*) In *Medina v. Hillshore Partners*  
10 (1995) 40 Cal.App.4th 477, 486, involving a wrongful death claim by the mother of a young  
11 man shot by gang members at an apartment complex, the Court said, "We agree that the  
12 congregation of gangs poses a foreseeable risk of harm to the public." In particular, the whole  
13 spectrum of typical street gang conduct, ranging from loitering, to public drinking and  
14 boisterousness, to drug dealing, to gunfire, has been held to "easily meet the statutory  
15 standard" for a public nuisance under Civil Code section 3479. (*People ex rel. Gallo v. Acuna*  
16 (1997) 14 Cal.4th 1090, 1120.)

17 17. Civil Code section 3491 provides for the methods by which public nuisances  
18 such as those alleged herein may be abated. Civil Code section 3491 states that the  
19 "remedies against a public nuisance are indictment or information, a civil action or abatement."  
20 Abatement is "accomplished by a court of equity by means of an injunction proper and suitable  
21 to the facts of each case." (*Sullivan v. Royer* (1887) 72 Cal. 248, 249; see also *People v.*  
22 *Selby Smelting and Lead Co.* (1912) 163 Cal.84, 90 ("[I]n California, the rule is well established  
23 that in proper cases injunctive relief which accomplishes the purposes of abatement without its  
24 harsh features is permissible.")).

25 18. Code of Civil Procedure section 731 authorizes a city attorney to bring an action  
26 to enjoin or abate a public nuisance. It provides, in relevant part, "[a] civil action may be  
27 brought in the name of the people of the State of California to abate a public nuisance . . . by  
28 the city attorney of any town or city in which such nuisance exists."

1           19.     Where "a building or other property is so used as to make it a nuisance under the  
2 statute, the nuisance may be abated . . . , notwithstanding that the owner had no knowledge  
3 that it was used for the unlawful purpose constituting a nuisance." (*People ex rel. Bradford v.*  
4 *Barbieri* (1917) 33 Cal.App. 770, 779; *see also Sturges v. Charles L. Harney, Inc.* (1958) 165  
5 Cal.App.2d 306, 318 ("a nuisance and liability therefore may exist without negligence"); *People*  
6 *v. McCadden* (1920) 48 Cal.App. 790, 792 ("A judgment supported on findings that such  
7 nuisance was conducted and maintained on the premises in question, regardless of the  
8 knowledge of the owner thereof, is sufficient. Such knowledge on the part of the owner . . . is  
9 unnecessary."); *People v. Peterson* (1920) 45 Cal.App. 457, 460 ("[I]t was not necessary . . .  
10 for the trial court to find either, that the [defendants] threatened, and unless restrained, would  
11 continue to maintain, aid, and abet, the nuisance, or that they knew the building was used in  
12 violation of the act. . . . The existence of the nuisance was the ultimate fact in this case, and  
13 having been found, supports the judgment.".) This is because "the object of the act is not to  
14 punish; its purpose is to effect a reformation of the property itself." (*People v. Bayside Land*  
15 *Co.* (1920) 48 Cal.App. 257, 261.)

#### 16                                   IV.     UNFAIR COMPETITION LAW

17           20.     The practices forbidden by the state Unfair Competition Law at Business and  
18 Professions Code section 17200 *et seq.* ("UCL") are any business practices forbidden by law,  
19 be it criminal, federal, state, municipal, statutory, regulatory or court-made. As the California  
20 Supreme Court has explained, the UCL "'borrows' violations of other laws and treats them as  
21 unlawful practices independently actionable under section 17200 *et seq.*" (*South Bay*  
22 *Chevrolet v. General Motors Acceptance Corp.* (1999) 72 Cal.App.4th 861, 880 (internal  
23 citations and quotation marks omitted).)

24           21.     As proscribed by the UCL, "[a]n 'unlawful business activity' includes anything that  
25 can properly be called a business practice and that at the same time is forbidden by law."  
26 (*People v. McKale* (1979) 25 Cal.3d 626, 632.) The ownership and operation of a large rental  
27 apartment complex, such as the Property, by sophisticated nonresident owners and managers  
28 doing so for the purposes of profit, is, axiomatically, a business under the UCL. (*See People*

1 ex. rel. *City of Santa Monica v. Gabriel* (2010) 186 Cal.App.4th 882, 888 ["The renting of  
2 residential housing is a business."].) Thus, when a property owner conducts, maintains or  
3 permits a nuisance that is unlawful under the PNL and NAL to exist on the premises of such a  
4 property, it is a violation of the UCL.

5 22. Moreover, the UCL casts a broad net. "Any person performing or proposing to  
6 perform an act of unfair competition may be enjoined . . ." (Bus. & Prof. Code, § 17203;  
7 emphasis added.) The term person includes "natural persons, corporations, firms,  
8 partnerships, joint stock companies, associations and other organizations of persons." (Bus. &  
9 Prof. Code, § 17201.) The courts have expanded section 17200's net beyond direct liability to  
10 include common law doctrines of secondary liability where the liability of each defendant is  
11 predicated on his or her personal participation in the unlawful practices. (*People v. Toomey*  
12 (1985) 157 Cal.App.3d 1, 14; *Emery v. Visa Int'l Service Ass'n* (2002) 95 Cal.App.4th 952,  
13 960.)

14 23. Civil actions under the UCL may be brought in the name of the People of the  
15 State of California by any city attorney of a city having a population in excess of 750,000 (Bus.  
16 & Profs. Code, § 17204), such as the City of Los Angeles. A public entity can sue pursuant to  
17 section 17200 based on violations of its own municipal code, state law, or other local  
18 ordinance. (*People v. Thomas Shelton Powers, M.D., Inc.* (1992) 2 Cal.App.4th 330, 338-339.)

19 24. Defendants engaging in violations of the UCL may be enjoined in any court of  
20 competent jurisdiction. (Bus. & Profs. Code, § 17203.) A court may make such orders or  
21 judgments, including appointment of a receiver, as may be necessary to prevent the use or  
22 employment by any person of any practice constituting unfair competition. (*Id.*)

23 25. Although no case has specifically been called upon to define the term "business"  
24 in section 17200, courts have frequently given a broad reading to the provisions of the UCL so  
25 as to effect its broad remedial purposes. (See, e.g., *Barquis v. Merchants Collection Ass'n*  
26 (1972) 7 Cal.3d 94, 111-113.) An enterprise engaged entirely in criminal conduct such as the  
27 manufacture of illegal drugs or obscene matter is a business for purposes of section 17200.

28 ///



1 (*People v. EWAP, Inc.* (1980) 106 Cal.App.3d 315, 320-321.) Moreover, recent amendments  
2 to section 17200 make clear that even a one-time act of misconduct can constitute a violation  
3 of the UCL. (*Klein v. Earth Elements, Inc.* (1997) 59 Cal.App.4th 965, 969.)

4 26. Further, the ownership and operation of a rental apartment complex is,  
5 axiomatically, a business. (See *People ex rel. City of Santa Monica v. Gabriel* (2010), 186  
6 Cal.App.4th 882, 888 ("The renting of residential housing is a business."); see also *Barquis v.*  
7 *Merchants Collection Ass'n*, (1972) 7 Cal.3d 94, 111-113 (giving a broad meaning of the UCL  
8 so as to effect its broad remedial purposes)). Thus, when a property owner conducts,  
9 maintains or permits a nuisance that is unlawful under the NAL and/or PNL to exist on the  
10 premises of such a business, it is a violation of the UCL. (See *San Francisco v. Sainez* (2000)  
11 77 Cal.App.4th 1302, 1323.)

12 **V. FIRST CAUSE OF ACTION FOR PUBLIC NUISANCE**

13 **[Civil Code section 3479, et seq.]**

14 **Against All Defendants and DOES 1 through 50]**

15 27. Plaintiff hereby incorporates by reference Paragraphs 1 through 26 of this  
16 Complaint and makes them part of this First Cause of Action as though fully set forth herein.

17 28. Since at least 1994, through the present time, Defendants, and DOES 1 through  
18 50, have alternately owned, operated, managed and used, and/or directly or indirectly  
19 permitted to be occupied and used, the Property in such a manner as to constitute a public  
20 nuisance in accordance with Civil Code sections 3479 and 3480. The public nuisance, as  
21 described herein, is injurious to health, indecent or offensive to the senses, and/or an  
22 obstruction to the free use of property, so as to substantially and unreasonably interfere with  
23 the comfortable enjoyment of life or property by those persons living in the surrounding  
24 community. The public nuisance consists of, but is not limited to, the constant, menacing,  
25 intimidating, violent and disorderly presence of resident and non-resident gang members  
26 and/or associates at the Property; the regular occurrence of gunfire at the Property; and the  
27 numerous unlawful handguns that are stored and possessed by gang members in and around  
28 Property, which provide the gang with quick and easy access when faced with the threat of

1 rival gangs or law enforcement.

2 29. Defendants, and DOES 1 through 50, in owning, conducting, maintaining, and/or  
3 permitting the use of the Property, directly or indirectly, as a public nuisance, have engaged in  
4 wrongful conduct and caused a serious threat to the general health, safety and welfare of the  
5 law-abiding tenants at the Property and persons in the area surrounding the Property.

6 30. Unless Defendants, and DOES 1 through 50, are restrained and enjoined by  
7 order of this Court, they will continue to use, occupy and maintain, and to aid, abet or permit,  
8 directly or indirectly, the use, occupation, and maintenance of the Property, together with the  
9 fixtures and appurtenances located therein, for the purpose complained of herein, to the great  
10 and irreparable damage of Plaintiff and in violation of California law.

11 **VI. SECOND CAUSE OF ACTION FOR UNFAIR COMPETITION**

12 **[Business and Professions Code Section 17200, et seq. --**

13 **Against All Defendants and DOES 1 through 50]**

14 31. Plaintiff hereby incorporates by reference paragraphs 1 through 30 of this  
15 Complaint and makes them part of this Second Cause of Action, as if fully set forth herein.

16 32. Ownership and rental of residential housing, such as the Property, is a business.  
17 When the owner and/or manager of such a business violates the PNL such that a nuisance  
18 exists and flourishes at the business' premises, as alleged herein, it is also a violation of the  
19 UCL.

20 33. Defendants and DOES 1-50 have violated the UCL by engaging in the following  
21 unlawful or unfair business acts and practices: conducting, maintaining and/or permitting,  
22 directly or indirectly, gang-related criminal and/or nuisance activity at the Property, as alleged  
23 herein, in violation of the PNL.

24 34. Plaintiff has no adequate remedy at law, and unless Defendants and DOES 1-50  
25 are restrained by this Court they will continue to commit unlawful business practices or acts,  
26 thereby causing irreparable injury and harm to the public's welfare.

27 ///

28 ///

1 **PRAYER**

2 **WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND**  
3 **DECREE AS FOLLOWS:**

4 **AS TO THE FIRST CAUSE OF ACTION**

- 5 1. That all Defendants be declared in violation of Civil Code section 3479, *et seq.*  
6 2. That the Property, together with the fixtures and moveable property therein and  
7 thereon, be declared a public nuisance and be permanently abated as such in accordance with  
8 Civil Code section 3491.  
9 3. That Defendant BORTOLO and her agents, officers, managers, employees and  
10 anyone acting on their behalf, and their heirs and assignees, be preliminarily and perpetually  
11 enjoined from operating, conducting, using, occupying, or in any way permitting the use of the  
12 Property as a public nuisance. Such orders should include, but not be limited to physical and  
13 managerial improvements to the Property, and such other orders as are appropriate to remedy  
14 the nuisance on the Property and enhance the abatement process.  
15 4. Such costs as may occur in abating said nuisance at the Property and such other  
16 costs as the Court shall deem just and proper.  
17 5. That Plaintiff be granted such other and further relief as the Court deems just and  
18 proper, including closure and/or demolition of the Property.

19 **AS TO THE SECOND CAUSE OF ACTION**

- 20 1. That all Defendants be declared in violation of Business and Professions Code  
21 section 17200.  
22 2. That Defendant BORTOLO, as well as her agents, managers, heirs, successors,  
23 and anyone acting on her behalf, be permanently enjoined from maintaining, operating, or  
24 permitting any unlawful or unfair business acts or practices in violation of Business and  
25 Professions Code section 17200.  
26 3. That the Court grant a preliminary and/or permanent injunction prohibiting  
27 Defendant BORTOLO, as well as her agents, managers, heirs, successors, and anyone acting  
28 on her behalf, from engaging in the unlawful or unfair acts and/or practices described herein at

1 the Property and in the City of Los Angeles. Such orders should include physical and  
2 managerial improvements to the Property.

3 4. That, pursuant to Business and Professions Code section 17206, all  
4 Defendants be assessed a civil penalty of Two Thousand Five Hundred Dollars (\$2,500) for  
5 each and every act of unfair competition.

6 5. That, pursuant to the Court's equitable power and Business and Professions  
7 Code section 17203, the Court make such orders or judgments, including appointment of a  
8 receiver, to eliminate the unfair competition alleged herein.

9 **AS TO ALL CAUSES OF ACTION**

10 1. That Plaintiff recover the amount of the filing fees and the amount of the fee for  
11 the service of process or notices which would have been paid but for Government Code  
12 section 6103.5, designating it as such. The fees may, at the Court's discretion, include the  
13 amount of the fees for certifying and preparing transcripts.

14 2. That Plaintiff be granted such other and further relief as the Court deems just  
15 and proper.

16 DATED: November 20, 2015

Respectfully submitted,

18 MICHAEL N. FEUER, City Attorney  
19 JONATHAN CRISTALL, Assistant City Attorney

20  
21 By: Kimberly A. Erickson  
22 KIMBERLY A. ERICKSON  
23 Attorneys for Plaintiff, THE PEOPLE OF THE  
24 STATE OF CALIFORNIA  
25  
26  
27  
28

**EXHIBIT 1**



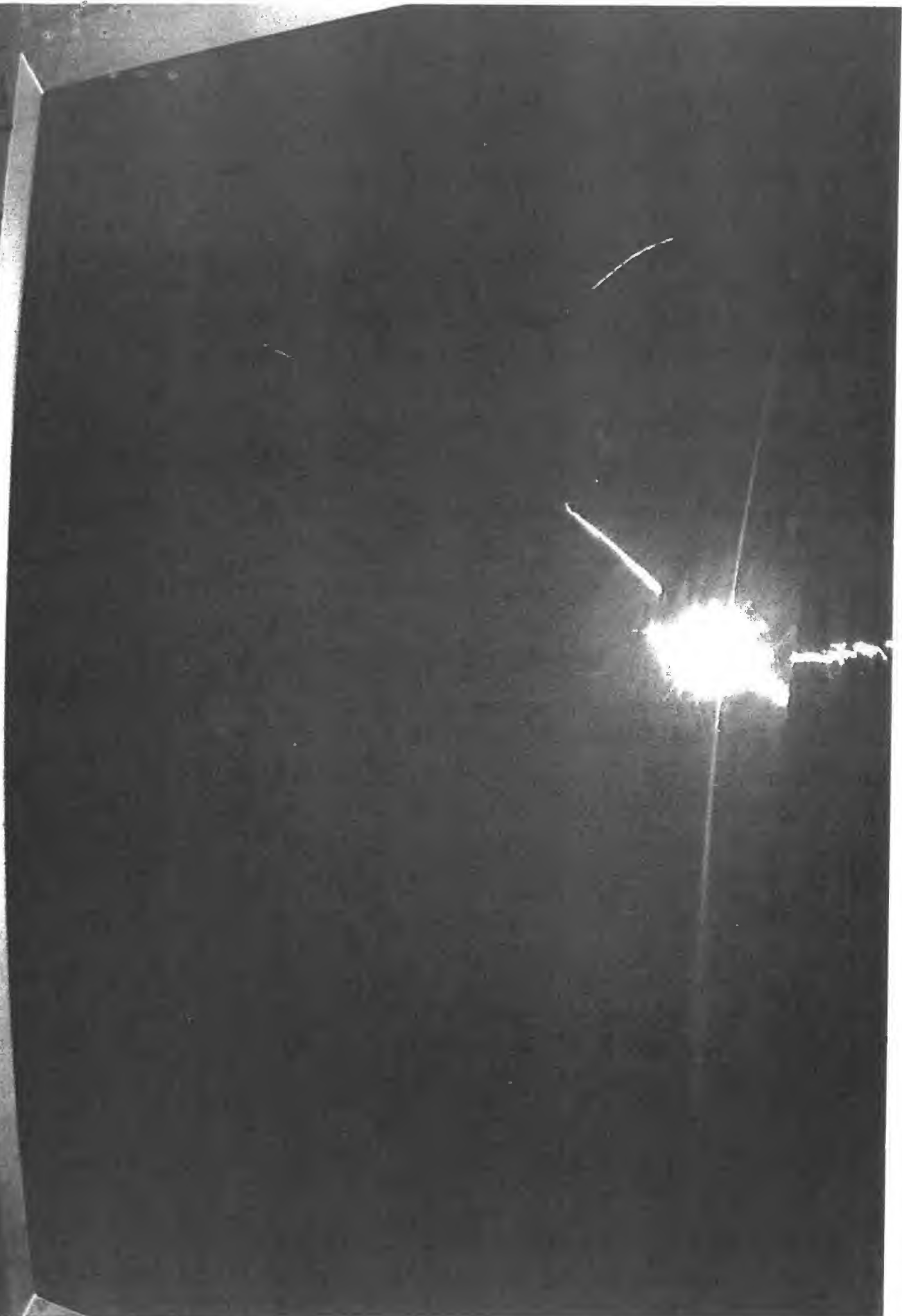
**EXHIBIT 2**





**EXHIBIT 3**

1975-1978  
5068-701  
LAWNS  
FILLER



MR. DUCHES  
 FAMILY IN PEACE  
 OUR FIRST BIRTHDAY  
 FEBRUARY 27, 1904  
 1824

Family  
 892

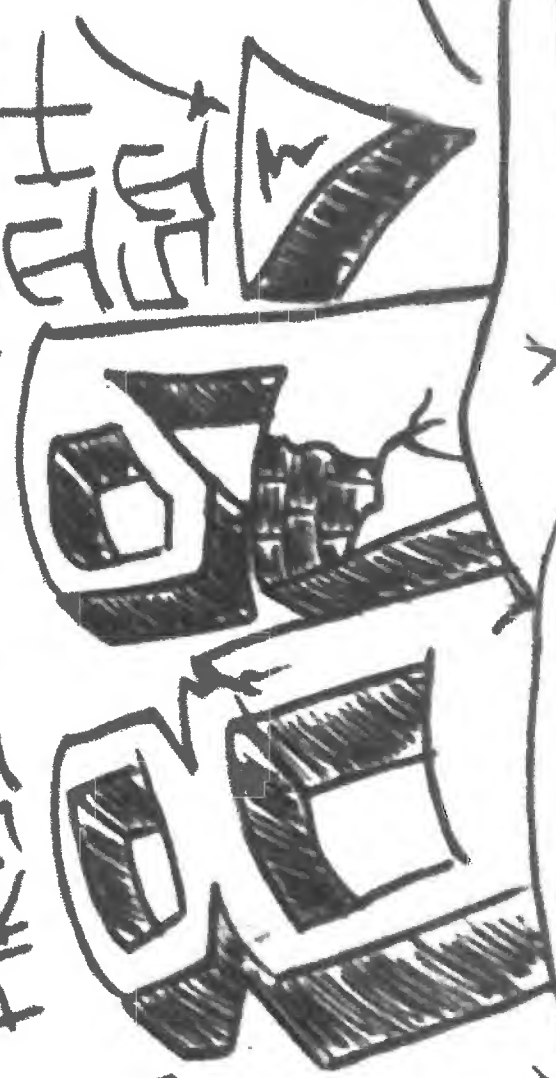
some bird keep alive bird

18,21,1

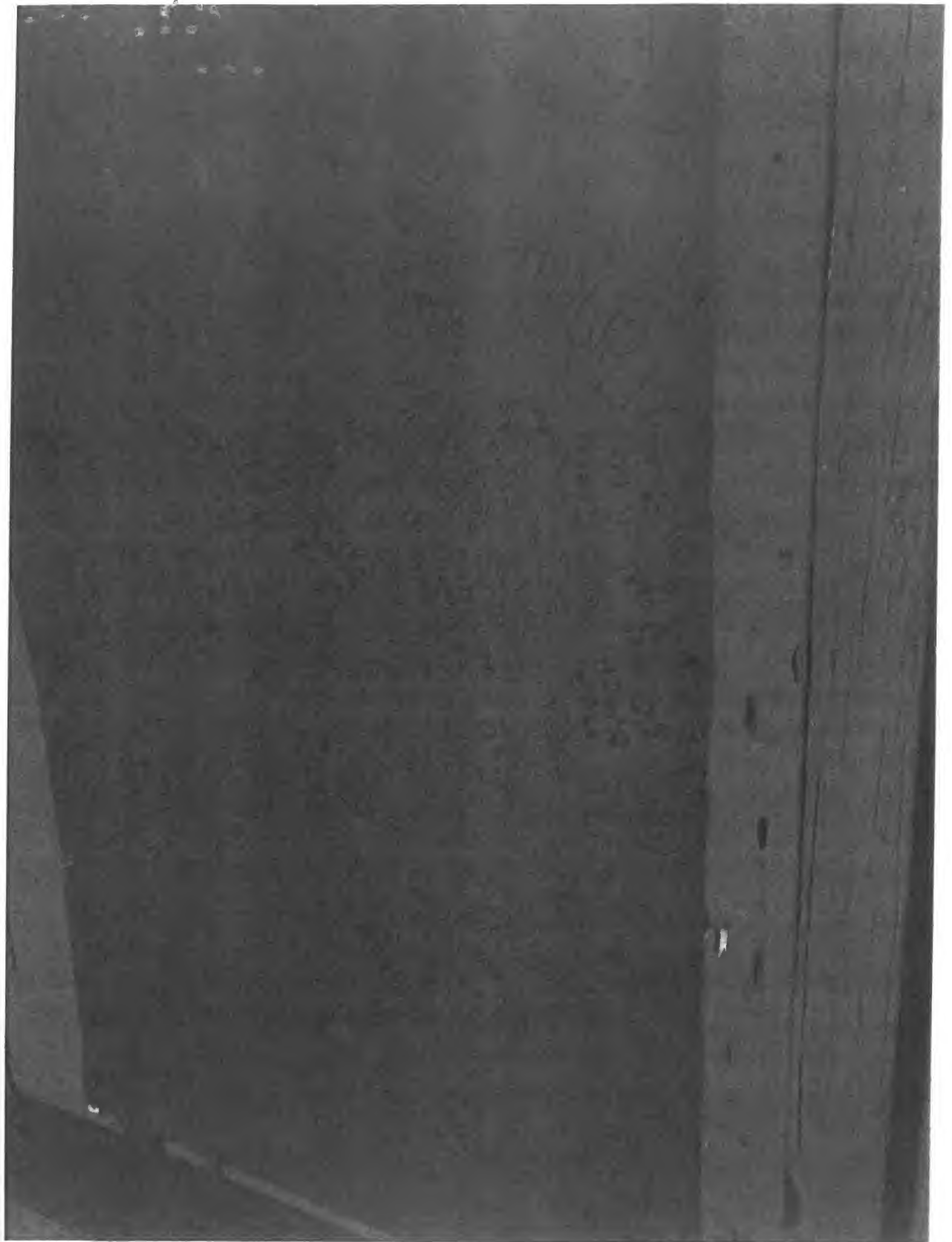
Handwritten symbols and characters, possibly representing a date or code.

Handwritten text in a stylized script, possibly a mix of English and another language.

Handwritten text at the bottom left, possibly a signature or date.



Handwritten text at the bottom right, possibly a signature or date.



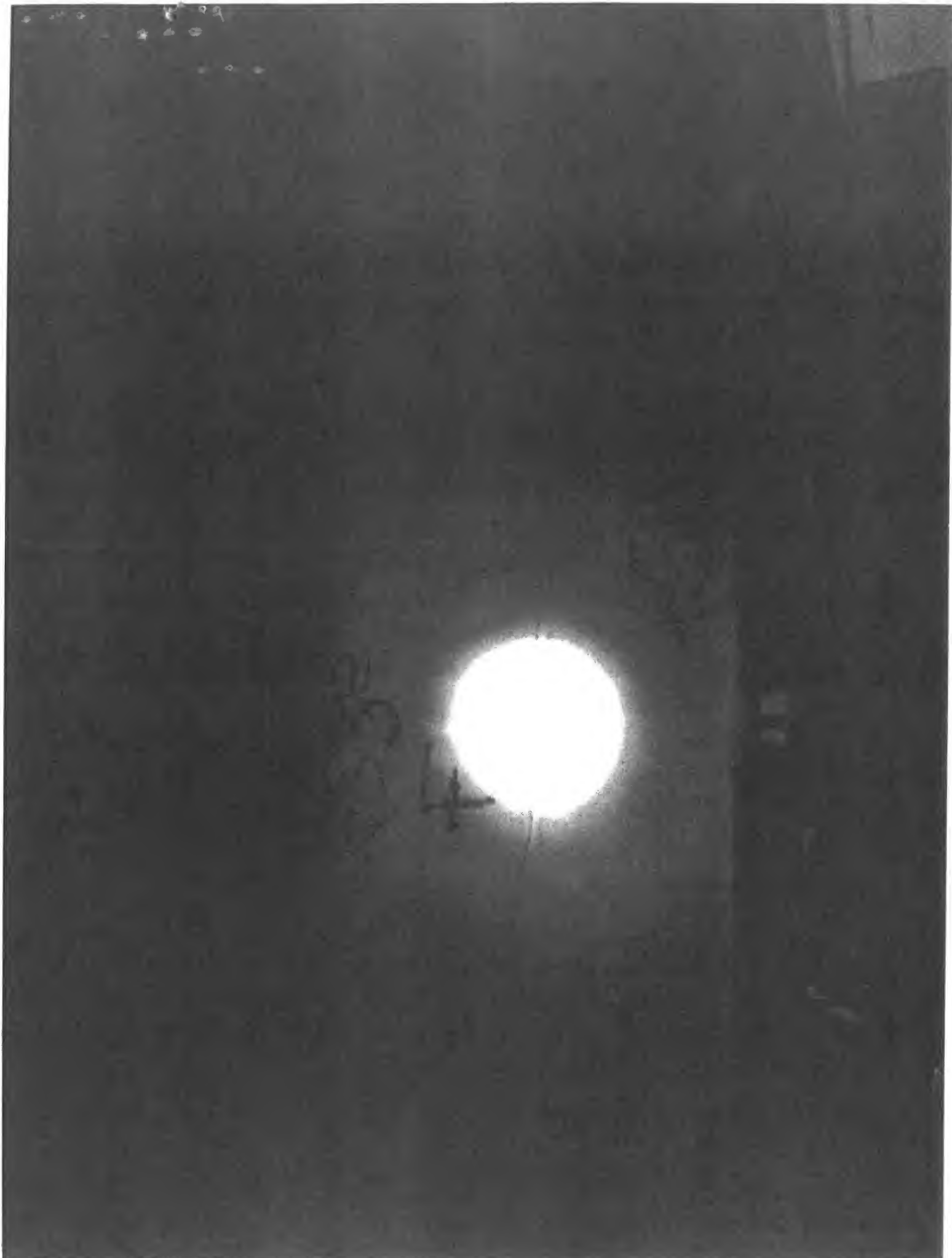


2857

4

285









**EXHIBIT 4**

NO TRESPASSING  
VIOLATORS WILL BE  
PROSECUTED  
LAW SEC. 41.24 PC 602L

7BTH139  
LACARSREPOWAREHOUSE.COM

